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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LISA A. BRYANT,

Plaintiff,

v.

**MADISON MANAGEMENT SERVICES,
LLC, and WALDMAN & PORRAS, PLLC,**

Defendants.

:
: Case No.: 2:20-cv-00594-JAD-EJY
:
:
:
:
: ~~[PROPOSED]~~ STIPULATION AND
: ORDER TO STAY DISCOVERY AND
: SCHEDULE SETTLEMENT
: CONFERENCE
:
: [FIRST REQUEST]
:

Pursuant to Local Rule 16-5, Plaintiff, Lisa Bryant, and Defendants, Madison Management Services, LLC, and Waldman & Porras, PLLC, (collectively known as the “Parties”) by and through their attorneys, hereby stipulate to stay all discovery deadlines and other deadlines in the February 1, 2021 Scheduling Order (ECF No. 39) for 60 days pending mediation and settlement discussions.

1. Completed Discovery.

The parties have exchanged initial disclosures. Parties have served written discovery.

2. Remaining Discovery.

Written discovery responses from Plaintiff and the parties’ depositions.

1 **3. Good Cause.**

2
3 The parties believe that this case is ripe for mediation at this time and are seeking a 60-day
4 stay all discovery deadlines and other deadlines. This stipulation is made in good faith, is not
5 interposed for delay, and is not filed for an improper purpose. Furthermore, a trial date has not
6 been set at this time.

7
8 **4. Current Discovery Deadlines.**

- 9 • Discovery Cutoff: **June 5, 2021**
10 • Deadline to Amend Pleadings: **March 17, 2021**
11 • Deadline to Disclose Initial Expert Disclosures: **April 16, 2021**
12 • Deadline to Disclose Rebuttal Expert Disclosures: **May 17, 2021**
13 • Dispositive Motion Deadline: **July 15, 2021**
14 • Joint Proposed Pretrial Order: **August 16, 2021**

15
16 **5. Proposed Discovery Deadlines.**

- 17 • Discovery Cutoff: **August 5, 2021**
18 • Deadline to Amend Pleadings: **May 17, 2021**
19 • Deadline to Disclose Initial Expert Disclosures: **June 16, 2021**
20 • Deadline to Disclose Rebuttal Expert Disclosures: **July 17, 2021**
21 • Dispositive Motion Deadline: **September 15, 2021**
22 • Joint Proposed Pretrial Order: **October 16, 2021**

23
24 WHEREAS, no prejudice will occur to this Court or the Parties if granted, good cause
25 supports this request to extend discovery;

26 NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS
27 HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

28 The February 1, 2021 Scheduling Order shall be amended as follows:

- Discovery Cutoff: **August 5, 2021**
- Deadline to Amend Pleadings: **May 17, 2021**
- Deadline to Disclose Initial Expert Disclosures: **June 16, 2021**
- Deadline to Disclose Rebuttal Expert Disclosures: **July 17, 2021**
- Dispositive Motion Deadline: **September 15, 2021**
- Joint Proposed Pretrial Order: **October 16, 2021**

NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS
HEREBY STIPULATED AND AGREED, by and between the Parties that this matter shall be
scheduled for Court Mediation/Settlement Conference on a future date selected by the Court that
is at least 30-days from the filing of this Stipulation and Order to Stay Discovery and Schedule
Settlement Conference.

IT IS SO STIPULATED.

DATED: February 22, 2021

FREEDOM LAW FIRM, LLC

By: /s/ George Haines
GEORGE HAINES, ESQ.
Nevada Bar No.: 9411
8985 S. Eastern Ave., Suite 350
Las Vegas, NV 89123
Attorney for Plaintiff
LISA BRYANT

DATED: February 22, 2021

WALDMAN & PORRAS, PLLC

By: /s/ Nicholas M. Porras
NICOLAS M. PORRAS, ESQ.
Nevada Bar No.: 12849
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Attorney for Defendants
MADISON MANAGEMENT SERVICES,
LLC, AND PORRAS, PLLC

ORDER GRANTING

STIPULATION TO EXTEND DISCOVERY

In consideration of the parties' stipulation and good cause showing, **IT IS ORDERED** **THAT** the February 1, 2021 Scheduling Order shall be amended as follows:

- Discovery Cutoff: **August 5, 2021;**
- Deadline to Amend Pleadings: **May 17, 2021;**
- Deadline to Disclose Initial Expert Disclosures: **June 16, 2021;**
- Deadline to Disclose Rebuttal Expert Disclosures: **July 17, 2021;**
- Dispositive Motion Deadline: **September 15, 2021; and**
- Joint Proposed Pretrial Order: **October 16, 2021.**

IT IS FURTHER ORDERED that the Court will issue a separate order scheduling the settlement conference.

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: February 25, 2021